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Behavioral Health Services of St. Peter's ♦ The Guardian Building
50 S. Last Chance Gulch, Suite 5, Helena, MT 59601 ♦ (406)447-2800

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**FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

In the Matter of)	
)	
Federal-State Joint Board)	<u>COMMENTS ON NOTICE OF</u>
on Universal Service)	<u>PROPOSED RULE MAKING</u>
)	

Comments from: Southwest Montana Telepsychiatry Network
Helena, Montana

Date: April 8, 1996

Identifying Information:

Southwest Montana Telepsychiatry Network represents mental health care providers and educators in a 12 county region of southwest Montana. The region covers more than 28,000 square miles with a population of approximately 197,000 people. The network was established in response to a lack of access to psychiatric care in the region. Through the use of advanced telecommunications technology, the network has developed interactive video consult stations to increase access and quality of specialized mental health care and education in the region. Lack of availability of advanced technology in rural and frontier areas at a reasonable rate has been a tremendous barrier to the growth and success the network.

The following brief comments are provided in regard to key provisions of the Universal Services sections. I have attempted to be succinct in my comments and have selected a small cross section of the Act. I am formally requesting I be in receipt of any additional information necessary to provide the Board with reply comments.

Comments:

Section 254(a)(1) : The definition of services supported by Federal universal service support mechanisms should include advanced telecommunications, availability of digital services for all

Noted Changes made
EHS/ADP/ST
O+S

rural communities. The commission needs to recognize the more remote a community, the greater the need for advanced telecommunications.

Section 254(b)(1): "Affordable" rates will be difficult to define. A dictionary definition would suggest the rates need to be borne without serious inconvenience. I propose the following: When cost is a barrier to the development and /or implementation of telecommunications based projects, the rate is not affordable.

Section 254(b)(2) : Bringing advanced services to all regions will take time. Special emphasis should be placed on implementing services for the legislatively prescribed purposes of health and education.

Section 254(b)(3) : The FCC must be cognizant that "urban centers" in rural states such as Montana meet Federal criteria as "rural communities". I am gravely concerned that telecommunications carriers will point to these "rural" communities as demonstrative of their efforts to bring advanced communications to rural areas. Access must be to all areas and rurality must be defined relative to varied demographics.

Section 254(b)(4) : It is the intent of Congress to "accelerate rapidly private sector deployment of advanced services to all Americans". The telecommunications bill recognizes that local telecommunication providers whom provide advanced telecommunications to rural areas may in some circumstances draw from without contributing to the universal service pool. Congress has identified an excellent incentive that will encourage a more level playing field and may help create needed access through competition. I urge the Joint Board to recognize this potential (drawing from the pool without contributing) as intended and to thereby encourage local telco's to participate in bringing advanced telecommunications to small, rural markets.

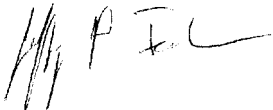
Section's 254(b)(6), 254(c): The Joint Board is charged with determining whether or not services are "essential" to health care, education and safety. The Board should read this language in tandem with the intent to provide advanced telecommunications to ALL communities and at reasonably comparable rates. The intent here is to provide access to health care and education via telecommunications so that it is available to those in remote areas as readily as it is to those in urban centers.

Section 254(h)(1): The act assures the availability of telecommunication services to health care providers at reasonably comparable rates with Federal support mechanisms. The section distinguishes between telecommunication services and "advanced services".

If advanced services (e.g. digital technology) are essential to health care, necessary for the provision of health care and are part of a bona-fide request, the distinction is blurred. I recommend the Joint Board adopt a position consistent within legislative intent to provide these advanced services and not relegate advanced health care needs behind core (private)recipients of universal pool funds.

Section 254(h)(2): The Joint Board needs to set a standard on what is "feasible and economically reasonable". The marketplace by its inactivity in rural areas has already cast its vote countering this proposition. The Board must develop high standards and expectations, (e.g. digital technology should be universally available). Otherwise, despite the intent of the Act, the status quo will be maintained. The Board again must remain sensitive that definitions of rurality often include the "urban" centers of rural states. The intent of the act demands more than bringing advanced services to these communities, it demands bringing these services to truly rural areas.

Respectfully Submitted,



Jeffrey P. Folsom, LCSW, J.D.
Director
Southwest Montana Telepsychiatry Network
50 S. Last Chance Gulch
Helena, Montana 59601

(406) 447-2800 voice
(406) 447-2738 fax
jpfolsom@ix.netcom.com